



Skarzynski Marick & Black LLP  
One Battery Park Plaza, 32nd Floor  
New York, New York 10004  
P 212.820.7700 | F 212.820.7740  
skarzynski.com

**James Sandnes**  
Direct: (212) 820-7760  
jsandnes@skarzynski.com

May 31, 2019

**VIA ELECTRONIC FILING**

The Honorable Ona T. Wang  
United States Magistrate Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *Ex Parte Application of Iraq Telecom Limited for an Expedited Order to Take  
Discovery Pursuant to 28 U.S.C. § 1782, Case No. 1:18-mc-0458 (LGS) (OTW)*

Dear Judge Wang:

We are co-counsel for Applicant Iraq Telecom Limited ("Iraq Telecom"). As Your Honor knows, presently pending for decision is Iraq Telecom's application pursuant to § 1782 seeking discovery in aid of several foreign arbitration and court proceedings (the "Application"). We write to provide the Court with a significant update on the status of the pending ICC Arbitration (referred to as the Breach of Agreement RFA in the Application).

Specifically, the Arbitral Tribunal in the ICC Arbitration has now issued a procedural order setting forth, among other things, the timetable for the arbitration (the "Procedural Order"). Pursuant to the Procedural Order, Iraq Telecom must file its "Statement of Claim", together with witness statements, expert reports, and any documents relied upon, **by August 28, 2019**.

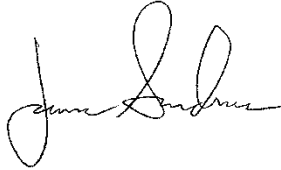
Given the need to finalize scope issues with the banks and then have sufficient time to receive and review the production before that deadline, Iraq Telecom respectfully requests that this Court rule on the pending Application as much in advance of the impending deadline set by the Tribunal (which is now less than 14 weeks away) as possible. As always, we would be

The Honorable Ona T. Wang  
March 31, 2019  
Page 2

happy to provide the Court with any additional material or argumentation it may require to resolve the Application.

Thank you for your consideration of this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "James Sandnes". The signature is fluid and cursive, with a large loop at the end.

James Sandnes

cc: All counsel of Record by ECF Filing

4840-7786-6136, v. 2